

SK:APW
F. #2020R01125

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

RAZA SIKANDAR,

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Misuse of a Passport)

1. On or about November 18, 2020, within the Eastern District of New York and elsewhere, the defendant RAZA SIKANDAR did willfully and knowingly use and attempt to use a passport which was issued and designed for the use of another person.

(Title 18, United States Code, Sections 1544 and 3551 et seq.)

COUNT TWO
(Aggravated Identity Theft)

2. On or about November 18, 2020, within the Eastern District of New York and elsewhere, the defendant RAZA SIKANDAR, during and in relation to the crime charged in Count One, did knowingly and intentionally possess and use, without lawful

I N D I C T M E N T

Cr. No. 1:20-cr-00582 (MKB)(RML)
(T. 18, U.S.C., §§ 982(a)(6)(A),
982(b)(1), 1028A(a)(1), 1028A(b),
1028A(c)(7), 1544 and 3551 et seq.; T.
21, U.S.C., § 853(p))

authority, a means of identification of another person, to wit: a United States passport in the name of an individual whose identity is known to the Grand Jury.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), 1028A(c)(7) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(6)(A), which requires the forfeiture of (a) any conveyance, including any vessel, vehicle or aircraft used in the commission of such offense; and (b) any property, real or personal that: (i) constitutes, or is derived from or is traceable to, the proceeds obtained directly or indirectly from the commission of such offense; and (ii) is used to facilitate, or is intended to be used to facilitate, the commission of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be

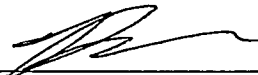
divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any

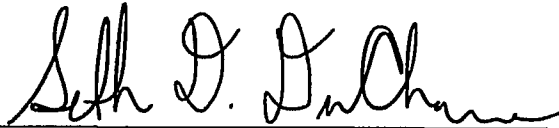
other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(6)(A) and 982(b)(1); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F#: 2020R01125
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

Raza Sikandar

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 982(a)(6)(A), 982(b)(1), 1028A(a)(1), 1028A(b),
1028A(c)(7), 1544 and 3551 et seq.; T. 21, U.S.C. § 853(p))

A true bill.

Foreperson



Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Andrew Wenzel, Assistant U.S. Attorney (718) 254-6466